

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

In re:

Crucible Industries LLC,

Debtor.

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) Chapter 11
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) Case No. 24-31059 (WAK)
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**NOTICE OF MOTION OF THE NORTH RIVER INSURANCE COMPANY'S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY PURSUANT TO
SECTION 362 OF THE BANKRUPTCY CODE (I) TO COMPEL PAYMENT BY
THE DEBTOR OF POST-PETITION INSURANCE OBLIGATIONS AND TO
PERMIT CANCELLATION OF THE DEBTOR'S INSURANCE POLICY IF SUCH
POST-PETITION OBLIGATIONS ARE NOT TIMELY MADE, AND (II) TO
PERMIT THE NORTH RIVER INSURANCE COMPANY TO APPLY A CASH
DEPOSIT TO UNPAID OBLIGATIONS OF THE DEBTOR, AND FOR OTHER
RELIEF.**

PLEASE TAKE NOTICE that on March 19, 2025, The North River Insurance Company ("North River") filed a motion for an Order modifying the automatic stay in the above-captioned bankruptcy case (I) to compel payment by the Debtor of post-petition insurance obligations and to permit cancellation of the Debtor's insurance policy if such post-petition obligations are not timely made, and (II) to permit North River to apply a cash deposit to unpaid obligations of the Debtor, and other relief (the "Motion") with the United States Bankruptcy Court for the Northern District of New York (the "Court").

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion and any objections related thereto will be held before the Honorable Wendy A. Kinsella, Chief United States Bankruptcy Judge for the Northern District of New York on the 17 day of April, 2025 at 11:30 am (prevailing Eastern time) (the "Hearing"), or as soon thereafter as counsel can be heard.

PLEASE TAKE FURTHER NOTICE that parties may appear at the Hearing in person at the United States Bankruptcy Court for the Northern District of New York, James M. Hanley

U.S. Courthouse and Federal Building, 100 South Clinton Street, Syracuse, New York 13216, OR
by telephone via call-in number: 315-691-0477 and Conference ID: 932081324#.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Motion must (a) be in writing; (b) be filed with the Clerk of the United States Bankruptcy Court for the Northern District of New York in Syracuse, New York and (c) served upon (i) counsel for North River, McElroy, Deutsch, Mulvaney & Carpenter, LLP, 225 Liberty Street, 36th Floor, New York, NY 10281 (Attn: Gary D. Bressler, Esq.) (ii) counsel for the Debtor, Bond Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202 (Attn: Charles J. Sullivan, Esq., Grayson T. Walter, Esq.), (iii) the Office of the United States Trustee for the Northern District of New York, 10 Broad Street, Room 105, Utica, New York 13501 (Attn: Erin P. Champion, Esq.); (iv) counsel for KeyBank National Association, Thompson Hine LLP, 3900 Key Center, 127 Public Square, Cleveland, OH 44114 (Attn: Curtis Tuggle and James Henderson); and (v) those persons who have formally appeared and requested service in this case pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure, so as to be received on or before the Objection Deadline which is seven (7) days prior to the hearing date, in accordance with Local Bankruptcy Rule 9013-1(g).

PLEASE TAKE FURTHER NOTICE that only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Bankruptcy Court at such hearing.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

**McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

Dated: March 19, 2025

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